

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA

Jared Goyette, *on behalf of himself and
other similarly situated individuals,*

Plaintiff,

v.

City of Minneapolis; Minneapolis Chief of
Police Medaria Arradondo, *in his
individual and official capacity*;
Minneapolis Police Lieutenant Robert
Kroll, *in his individual and official
capacity*; Minnesota Department of Public
Safety Commissioner John Harrington, *in
his individual and official capacity*;
Minnesota State Patrol Colonel Matthew
Langer, *in his individual and official
capacity*; and John Does 1-2, *in their
individual and official capacities*,

Defendants.

Court File No. 0:20-cv-01302-WMW-
DTS

**SUPPLEMENTAL AFFIDAVIT IN
SUPPORT OF MOTIONS FOR
TEMPORARY RESTRAINING
ORDER AND CLASS
CERTIFICATION**

I, Pari I. McGarraugh, state as follows:

1. I am one of the attorneys representing Plaintiff Jared Goyette in this matter.
2. I make this declaration for the purpose of making available durable and accessible copies of video footage depicting some of the incidents referenced in Plaintiff's complaint for the Court's convenience.
3. On June 2, 2020, NBC video and photojournalist Ed Ou posted a video to Twitter depicting an incident during which he was injured by the Minnesota State Patrol.

This incident is referenced in Paragraph 56 of Plaintiff's Complaint (Dkt. 001). In his tweet, Ou described the incident:

This weekend, journalists in a group covering the protests in Minneapolis were hit with pepper spray, concussion grenades, batons, and tear gas by Minnesota State Patrol. We had our cameras out, press badges on and were clearly identifiable as media. I ended up with 4 stitches.

A true and correct copy of the video posted by Mr. Ou, retrieved from <https://twitter.com/edouphoto/status/1267958349477249024>, is attached as **Exhibit 1**.

4. As described in Paragraph 46 of the Complaint, on May 30, a Minneapolis police officer approached Adams with a weapon pointed directly at him and, even after Adams identified himself as press, the officer threw him to the ground. While Adams was lying face down on the ground, another officer slowly walked by him. When Adams again said, "I'm press," and held up his credential, this officer casually pepper sprayed Adams directly in the face at close range, then continued strolling. A true and correct video of this incident, posted by Adams to Twitter on May 31, 2020 and retrieved from <https://twitter.com/MichaelAdams317/status/1267203751913422849> is attached as **Exhibit 2**.

5. As described in Paragraph 16 of the Complaint, CNN correspondent Omar Jimenez was arrested on national television despite asking the State Patrol to "put us back where you want us, we are getting out of your way." A true and correct copy of the live broadcast retrieved from <https://www.youtube.com/watch?v=ftLzQefpBvM> is attached as **Exhibit 3**.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge.

Dated: June 6, 2020

/s/ *Pari I. McGarraugh*

Pari I. McGarraugh

70216577 v1